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Santiago, April 20, 2016

The Honorable Raymond J. Dearie
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: USA v. Jadue, Case #: 1:15-cr-00570-RJD-1

Dear Judge Dearie:

I am writing on behalf of CIPER, the Chilean Center for Investigative Reporting, to respectfully request Your Honor to unseal the plea agreement hearing transcript for Defendant Sergio Jadue in the case USA v. Jadue. No 15-cr-00570-RJD-1.

In a related case, Your Honor recently granted a similar request made by Bloomberg News, a request which sought to unseal the plea agreement hearing transcripts from the related case, and that any underlying plea and/or cooperation agreement be publicly filed (U.S. v. Webb, No 15-cr-00252-RDJ). As Bloomberg noticed in its letter, other transcripts and plea agreements of defendants in the same FIFA scandal have been already unsealed (*See* U.S. v. Blazer, No. 13-CR-602 RJD E.D.N.Y. June 15, 2015 ECF No. 26 and U.S. v. Hawilla, No. 14-CR-609 RJD E.D.N.Y Oct 14, 2015).

We respectfully request that the plea transcripts and plea documents of Defendant Jadue be made available to the public. We believe that the public has a



fundamental right of access to them. There is no compelling reason for closure in this case that would justify keeping the hearing transcripts secret.

The prosecution of this case (so called “FIFA scandal”) is shaking the ground in Chile and the rest of South America. We believe that the public has a pressing and legitimate interest to know how South American football authorities behaved in the past and how the governing body of the world’s most popular sport has been compromised. Only days after publicly stating his innocence, defendant Jadue pleaded guilty before U.S. authorities. He is accused of racketeering conspiracy, in violation of 18 U.S.C. § 1962(d) and one count of wire fraud conspiracy, in violation of 18 U.S.C. § 1349.

The disclosure of the documents related to this case is critical for the people in Chile to trust in the fairness of a judicial process that is taking place abroad.

We appreciate Your Honor’s consideration of this request.



Mónica González/Mujica
Director
CIPER Chile

Cc: Counsel of Record for Defendant Jadue and for Plaintiff United States of America (via e-mail)